

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
Free Speech Systems, LLC	§	CASE NO. 22-60043
Debtor.	§	

**OBJECTION TO CONFIRMATION BY
ELEVATED SOLUTIONS GROUP, LLC**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Elevated Solutions Group, LLC (“ESG”), and files its *Objection To Confirmation*, and would respectfully show the Court as follows:

1. The Debtor filed its *Amended Chapter 11 Plan Of Reorganization*, with confirmation set by the Court for March 25-27, 2024.
2. ESG opposes confirmation of the Debtor’s Plan.
3. The Debtor’s Plan is not confirmable for the follow reasons:
 - a. The Debtor has failed to comply with the applicable provisions of the Bankruptcy Code, specifically has failed to comply with a Court order for payment of post-petition services and has failed to otherwise properly manage the estate as to not incur additional liabilities without court approval.
 - b. The Debtor has not proposed its plan in good faith as it attempts to cover and discharge post-petition liabilities for actions in non-compliance with its duties under the Code and Rules.
 - c. The Plan’s provisions regarding discharge, exculpation and post-confirmation injunctive relief exceed the allowable scope under the Code.
 - d. The Debtor appears to be mismanaged by the current CRO as post-petition payments for services have not been accounted for nor paid,

funds not belonging to the estate have failed to be accounted for and accounting for goods sold has failed to be provided. It does not appear from the current management that a liquidation or further reorganization will not be required.

WHEREFORE, ESG requests the Court to deny confirmation, and for such other and further relief, at law or in equity, which it may be justly entitled.

Dated: March 8, 2024

.Respectfully submitted,

By: /s/ Johnie Patterson
Johnie Patterson
COUNSEL FOR ESG
SBN 15601700

OF COUNSEL:
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the above Objection, was served upon all parties receiving electronic notice in this case pursuant to the Court's CM/ECF noticing platform on March 8, 2024.

/s/ Johnie Patterson
Johnie Patterson